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**MEMO ENDORSED**

November 10, 2016

**VIA ECF**

The Honorable Richard M. Berman  
United States District Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Courtroom 12D  
New York, NY 10007

Re: United States v. Reza Zarrab, et al.,  
S1 15 Cr. 867 (RMB)

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 11/10/16

Dear Judge Berman:

We represent Reza Zarrab in the above-captioned matter. We, jointly with the Government, propose the following schedule:

Government Response to defense Motion to Suppress Emails (docket 112) on or before November 14, 2016. *17*

Defense Reply on or before November *21*, 2016 at 12:00 noon. *RMB*

Subject to ruling that a hearing is unnecessary, direct testimony of each witness shall be presented via affidavit not to exceed 10 pp per witness double spaced, and filed with the Court on or before November *29*, 2016 at 12:00 noon (along with a list and brief bio of each witness) *b24 RMB*

Hearings will be held on the Motion to Suppress Reza Zarrab's iPhone and Certain Statements (docket 64) and/or the Motion to Suppress Emails (docket 112) on November 30, 2016 at *10:00 a.m.* *RMB*

*An amended Schedule 9:15 A.M.  
SO ORDERED:  
RMB  
RICHARD M. BERMAN U.S.D.J.  
11/10/16*

Respectfully submitted,



Benjamin Brafman  
Joshua D. Kirshner

cc: All counsel of record (by ECF)